

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA	*	CASE NO. 5:21CR259
Plaintiff	*	
-vs-	*	JUDGE DONALD C. NUGENT
RONALD A. DIPIETRO	*	<u>MOTION TO WITHDRAW AS</u>
Defendant	*	<u>COUNSEL AND MOTION TO APPOINT</u>
	*	<u>APPELLATE COUNSEL</u>
	* * *	

Now come undersigned counsel and hereby move this Honorable Court for an order allowing them to withdraw as counsel for Defendant, Ronald A. DiPietro, in the above-captioned matter and to appoint appellate counsel. For cause, Mr. DiPietro wishes to appeal his sentence in the within action. However, Mr. DiPietro is without funds to retain counsel to handle the appeal. Based upon Mr. DiPietro's indigency, he requests that counsel be appointed to represent him in these proceedings. This Court has granted Mr. DiPietro's Motion to Proceed with Appeal In Forma Pauperis.

WHEREFORE, undersigned counsel respectfully request that they be permitted to withdraw as counsel for Mr. DiPietro, and that counsel be appointed to represent him in these further proceedings.

Respectfully submitted,

/S/ PETER T. CAHOON
PETER T. CAHOON, 0007343
Attorney for Defendant
200 Market Avenue North, Suite 300
Canton, Ohio 44702
(330) 453-5466
pcahoon@lawlion.com

/S/ NATHAN A. RAY
NATHAN A. RAY, 0041570
Attorney for Defendant
137 South Main Street, Suite 201
Akron, Ohio 44308
(330) 253-7171
burdon-merlitti@neo.rr.com

PROOF OF SERVICE

I hereby certify that on June 21, 2024, a copy of the foregoing Motion to Withdraw as Counsel and Motion to Appoint Appellate Counsel was electronically filed. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/S/ NATHAN A. RAY

NATHAN A. RAY

Attorney for Defendant